

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**PATRICIA DUKES,**

**Plaintiff,**

**VS.**

**PUTNAM NORTHERN WESTCHESTER :  
BOARD OF COOPERATIVE EDUCATIONAL :  
SERVICES, :**

### Defendants.

**Civil Action No. 08 CIV 5414 (SCR)**

## DEFENDANT'S INITIAL DISCLOSURES

Defendants, by their attorneys, Shaw, Perelson, May & Lambert, LLP, as and for their Initial Disclosures pursuant to Fed. R. Civ. P. 26 (a) (1) hereby provide the following information in the order provided by Rule 26 (a) (1):

A. Individuals likely to have discoverable information concerning the lawful basis for the actions of the defendants of which the plaintiff complains:

1. Plaintiff
2. Susan Micolo  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
2. Theresa Gurecki  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
3. Renée Gargano  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
4. Tom Gill  
c/o Putnam/No. Westchester BOCES

200 BOCES Drive  
Yorktown Hgts., NY 10598

5. Bill Richards  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
6. Sara Mills-Cohen  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
7. Nancy Rosa  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
8. Robert E. Kelderhouse  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
9. Doreen Sitzer  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
10. James T. Langlois  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
11. Student E.W.  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
12. Nicole Messia  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
13. Catherine Pacarelli

c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598

14. Laurie Cohen  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598 10924  
469-3959
15. Jennifer Lipowski  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
16. Stephanie Alter  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598
17. Soyoung Yoon  
c/o Putnam/No. Westchester BOCES  
200 BOCES Drive  
Yorktown Hgts., NY 10598

The defendant reserves its right to supplement this list pursuant to Rule 34.

B. Documents, etc. in possession of defendants that defendants may use to support their claims or defenses.

1. Notice of Charge of Discrimination and Charge dated 3/1/07
2. December 27, 2006 memorandum to Patricia Dukes from Thomas Gill
3. January 31, 2007 letter to Patricia Dukes from Dr. James T. Langlois
4. October 30, 2006 memo from Bob Kelderhouse to Tom Gill
5. Sexual Harassment policy 5121
6. Administrative regulation on Sexual Harassment
7. Policy on Complaints and Grievances by Employees 5170
8. Equal Employment Opportunity Policy 5120

9. December 15, 2006 letter to Renée Gargano from Theresa Gurecki
10. Confidential Report of Allegation dated December 22, 2006
11. December 18, 2006 note to Mr. Gill from Stephanie Alter
12. December 21, 2006 letter to Tom Gill from Soyoung Yoon
13. December 22, 2006 letter to Patricia Dukes from Renée Gargano
14. Undated letter from Patricia Dukes to Dr. James Langlois “to address several concerns . . . regarding my recent termination . . . .”

The defendant reserves its right to supplement this list pursuant to Rule 34.

C. Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of the judgment, etc.

Policy issued by New York Schools Insurance Reciprocal, Policy SBL BO 001, has been requested from insurer and will be supplied as soon as it is received.

Dated: July 31, 2008

**Shaw, Perelson, May & Lambert, LLP**  
Attorneys for Defendants

By: \_\_\_\_\_/S\_\_\_\_\_  
Mark C. Rushfield, Esq. (MCR 0231)  
Of Counsel  
21 Van Wagner Road  
Poughkeepsie, NY 12603  
845/486-4200